

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

IMPOSSIBLE FOODS INC., a Delaware  
corporation,

Plaintiff/Counter-Defendant

v.

IMPOSSIBLE LLC, a Texas limited liability  
company, and JOEL RUNYON,

Defendants/Counter-Plaintiffs.

Case No. 5:21-cv-02419-BLF (SVK)

**[PLAINTIFF'S PROPOSED] ORDER ON  
JOINT STATEMENT REGARDING  
DEFENDANT IMPOSSIBLE LLC'S  
NOTICES OF DEPOSITION OF APEX  
WITNESSES AND 30(b)(6) TOPICS**

Re: Dkt. No. XX

**ORDER**

Before the Court is a Joint Statement submitted by Plaintiff Impossible Foods Inc. concerning Defendant Impossible LLC's notice of deposition of an apex witness and Impossible LLC's notice of 30(b)(6) deposition. Having reviewed the Joint Statement and its exhibits, the Court grants Plaintiff's motion to quash because Impossible LLC is unable to identify the witnesses' unique first-hand, non-repetitive knowledge of the facts at issue in the case and has not exhausted other less intrusive discovery methods. The Court further grants Plaintiff's motion as to 30(b)(6) topics because, as written, the topics seek discovery-on-discovery, which is neither relevant to the merits of any claims or defenses nor proportional to the needs of the case.

Accordingly, Plaintiff's motion is hereby GRANTED.

**SO ORDERED.**

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HON. SUSAN VAN KEULEN  
United States Magistrate Judge